

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

LANDMARK LEGAL FOUNDATION

Plaintiff,

vs.

ENVIRONMENTAL PROTECTION AGENCY,

Defendant.

Case No. 1:12-cv-01726 (RCL)

**PLAINTIFF'S OPPOSITION TO
DEFENDANT'S MOTION FOR EXTENSION OF TIME**

Plaintiff Landmark Legal Foundation ("Landmark" or "Plaintiff") respectfully submits this opposition to Defendant Environmental Protection Agency's ("EPA" or "Defendant") "Unopposed" Motion for Extension of Time.

On June 24, 2013 Defendant submitted its "Unopposed" Motion for Extension of Time. However, in the previous consultation regarding this extension, Plaintiff's counsel stated that Landmark opposed this motion. Plaintiff has notified Defendant of this error, but EPA has not corrected its submission.

Landmark Legal Foundation respectfully renews its opposition to any extensions of time for the reasons stated in its previous opposition to EPA's motion for extension of time.

Respectfully submitted,

Landmark Legal Foundation

DATED: June 27, 2013

s/ Michael J. O'Neill
Michael J. O'Neill #478669
Mark R. Levin
Landmark Legal Foundation
19415 Deerfield Ave
Suite 312
Leesburg, VA 20176
703-554-6100
703-554-6119 (facsimile)
mike@landmarklegal.org

Richard P. Hutchison
Landmark Legal Foundation
3100 Broadway, Suite 1210
Kansas City, MO 64111
816-931-5559
816-931-1115 (facsimile)
rpetehutch@aol.com

CERTIFICATE OF SERVICE

Undersigned counsel hereby certifies that a true and accurate copy of the foregoing Opposition to Defendant's Motion for Extension of Time was filed electronically with the Court by using the CM/ECF system on this 27th day of June, 2013. Parties that are registered CM/ECF users will be served by the District Court's CM/ECF system.

/s/ Michael J. O'Neill
Michael J. O'Neill
Attorney for Plaintiff